

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,  
PELVIC REPAIR SYSTEMS  
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

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THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBIT A:

**JOINT MOTION TO DISMISS DEFENDANT  
AMERICAN MEDICAL SYSTEMS, INC. WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibit A and defendant American Medical Systems, Inc. (“AMS”) advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and AMS jointly move the court to dismiss AMS as a defendant in these actions with prejudice, and terminate AMS from the docket in the actions, parties to bear their own costs. Other defendants remain in these actions, and Plaintiffs will continue to prosecute these actions against them.

Respectfully:

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*Attorney for Plaintiffs on Exhibit A*

Dated: March 14, 2016

**EXHIBIT A**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:13-CV-18669	Brandy Davis v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-19057	Robin Herzog v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-30788	Mary Bennett v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-33587	Dawn Ford v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-33761	Martha Melton, Minor Lee Melton v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-11097	Katharine Johnson v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-12332	Phyllis Long, Johnny S. Long v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-12552	Mary Proulx v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-12800	Madeline Ruffino v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-13567	Barbara Karen Robertson v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-22515	Mathadonia Gilliard v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-23063	Catherine Lovett, Philip Lovett v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that on March 14, 2016, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Barbara R. Binis